

# Grant Law, LLC

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January 29, 2024 (Filed in Pacer Only)

Hon. Renee Bumb, USDJ  
Mitchell H. Cohen Building  
& U.S. Courthouse 4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**RE: Abdullah versus Rowan University case number 1:21 -cv- 19256- Concerning defendants' motion to dismiss with prejudice currently pending**

Judge Bumb:

Please be advised that consistent with your text order of last week, concerning the above referenced matter, I did considerable legal research to see if there was any precedent for a limited appearance on motion, but I must confess there is little if any case precedent, upon which to rely.

There are some cases concerning indigent clients, mostly in criminal context, but I found them to be neither controlling, nor persuasive.

As a result, after further discussions with Ms. Abdullah, I have decided to represent her in this matter, without a limited appearance, and will be filing a notice of appearance upon hearing from the court.

Please be further advised that Ms. Abdullah was hospitalized for over three days last week and has an extremely serious blood clot that the doctors have not fully decided upon how to proceed.

However, she is clearly under the weather physically and it will be imperative that she and I review the file and the motions, in order to properly respond and defend against them. At this time, she is still bedridden, but she anticipates being back in business by the middle to the end of this week.

Given the critical nature of these motions, and the amount of work involved, I respectfully ask the court to allow Ms. Abdullah through my office an additional three weeks until the end of business Monday, February 27, 2024. This additional time is needed because I have business concerning a real estate purchase and closing in Florida next week, and as a solo practitioner, I will not be able to respond to the motions without the additional time.

As a point of reference, I enclosed the discharge papers as Ms. Abdullah wanted me to show me, and ultimately the court, that she really has severe health issues that must be addressed hence the need for additional time to respond to the motions.

Thank you again for the Court's continuing consideration and understanding in this matter.

Very truly yours,  
Gary D. Grant ESQ  
Attorney for Shariese Abdullah.

With enclosures: discharge hospital papers